

BROWN RUDNICK LLP

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*Counsel to the Lehman Brothers
Treasury B.V. Noteholders Identified Herein*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|--------------------------------|
| _____ |) | |
| In re: |) | Chapter 11 |
| |) | |
| Lehman Brothers Holdings, Inc., |) | Case No. 08-13555 (JMP) |
| <i>et al.,</i> |) | |
| |) | (Jointly Administered) |
| Debtors |) | |
| _____ |) | |

**JOINDER OF VARIOUS LBT NOTEHOLDERS
IN SUPPORT OF THE RELIEF REQUESTED IN THE REPLY OF
THE OPERATING COMPANY CREDITORS TO THE DEBTORS'
OPPOSITION AND OBJECTION TO THE MOTION OF THE AD HOC GROUP OF
LEHMAN BROTHERS CREDITORS SEEKING, AMONG OTHER THINGS, AN
ORDER SCHEDULING A DISCLOSURE STATEMENT HEARING AND APPROVING
THE FORM AND MANNER OF NOTICE THEREOF**

The undersigned, who are holders (or investment advisors or managers for a fund or other entity which is a beneficial holder) of notes (the "LBT Issued Notes" and the holders thereof, the

“Noteholders”) issued by Lehman Brothers Treasury, B.V. (“LBT”), a non-Debtor that is subject to Dutch insolvency proceedings, and guaranteed by Lehman Brothers Holdings, Inc.,¹ hereby file this Joinder in support of the relief requested in² the *Reply of the Operating Company Creditors to the Debtors’ Opposition and Objection to the Motion of the Ad Hoc Group of Lehman Brothers Creditors Seeking, Among Other Things, An Order Scheduling a Disclosure Statement Hearing and Approving the Form and Manner of Notice Thereof* [Docket No. 15825] (the “Reply”).

WHEREFORE, the Noteholders respectively request that the Court set a schedule which allows for a concurrent hearing on all timely filed disclosure statements and postpone any determinations regarding the solicitation and plan confirmation procedures with respect to competing plans until a later date, upon proper notice and opportunity for a hearing.

[Signature blocks on following pages]

¹ Brown Rudnick LLP and Dewey & LeBoeuf LLP separately represent each of the undersigned Noteholders individually (as indicated in their respective signature blocks below) solely in respect of their LBT Issued Notes and not in respect to any other claims the Noteholders may hold against the Debtors and their affiliates. Each of the Noteholders separately requested that Brown Rudnick LLP or Dewey & LeBoeuf LLP, as the case may be, represent them in connection with their LBT Issued Notes and related guarantees.

² Each of the Noteholders submit this statement only in connection with its individual claims relating to those LBT Issued Notes for which it is the record holder, or in which it holds a beneficial ownership interest, or in respect to which it serves as an investment advisor or manager for a fund or other entity which is such a beneficial owner.

Dated: April 11, 2011
New York, New York

Respectfully submitted,

Certain funds and accounts managed by :
CYRUS CAPITAL PARTNERS, LP
ORE HILL PARTNERS LLC
SILVER POINT CAPITAL LP

By their Attorneys,

BROWN RUDNICK LLP

By: /s/ Steven B. Levine
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Counsel to the Lehman Brothers Treasury B.V.
Noteholders Identified Herein

Dated: April 11, 2011
New York, New York

Respectfully submitted,

Certain funds managed by:
ANGELO, GORDON & CO., L.P.
CASPIAN CAPITAL ADVISORS
CONTRARIAN CAPITAL MANAGEMENT, LLC
GOLDENTREE ASSET MANAGEMENT, LP
HAYMAN CAPITAL
KNIGHTHEAD CAPITAL MANAGEMENT, LLI
MASON CAPITAL MANAGEMENT LLC
MOUNT KELLETT CAPITAL MANAGEMENT
OAKTREE CAPITAL MANAGEMENT LP
SERENGETI ASSET MANAGEMENT LP
STONEHILL CAPITAL MANAGEMENT LLC

By their Attorneys,

DEWEY & LEBOEUF LLP

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